

From: [Cynthia Brown](#)
To: RandyCSmith1@cs.com
Subject: Re: USOR Site
Date: 01/03/2012 10:25 AM

I have been out of the office since Dec. 16, so the answer is no. I have forwarded his questions to Edwin Quinones, our site attorney and will be discussing the appropriate response with Ed on Wednesday.

Cynthia Brown
Removal Enforcement Coordinator
214-665-7480

▼ [RandyCSmith1---12/28/2011 01:24:41 PM---Cindy: Have you had a chance to respond to Dan Bonanni's e-mail?](#)

From: RandyCSmith1@cs.com
To: Cynthia Brown/R6/USEPA/US@EPA
Date: 12/28/2011 01:24 PM
Subject: USOR Site

Cindy:

[Have you had a chance to respond to Dan Bonanni's e-mail?](#)

Regards,
Randy C. Smith

From: Dan Bonanni
Sent: Tuesday, December 20, 2011 2:20 PM
To: 'Brown.Cynthia@epamail.epa.gov'
Cc: Dan Bonanni; Reuben Fernandez
Subject: US Oil Recovery ("USOR") PRP Status Dana Transport, Inc.
Importance: High

Ms. Brown: Dan Bonanni, representing Dana Transport, Inc., as to alleged PRP status with respect to USOR. Recently I have been working with Randy Smith, AEC, as to this matter and have queries as to what has been kindly provided by Randy. First, who is the TNRCC contact as to USOR? Second, since the alleged USOR abandonment in June 2010, in reviewing provided manifests, 165 gallons of D018, and approximately 672,056 gallons of non-hazardous waste water, dated 2003-2005 as to TSDF disposal interaction, no proof exists as to disposal/treatment of said gallons since 2003-2005? This material remains on-site in lagoons or drums in that it's alleged to have been pre-treated or treated? Third, is there a waste classification distinction as to non-hazardous versus the 165 gallons of D018 regarding cleanup cost ratios and PRP? Finally, would you be kind enough to send me a

copy of the ACO, dated August 25, 2011.

Should you have any queries whatsoever, please do not hesitate to contact this writer at (800) 733-3262, 106. I thank you in advance for your time and consideration in this matter.

Senior Vice President

Office of Risk Management

210 East Essex Avenue

Avenel, NJ 07001

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F: 732-596-1452

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dbonanni@danacompanies.com

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